

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NESSA RISLEY, JAMES FREELAND, ROBERT
SCOTT, ANNIE VENESKY, ANDREW
CARDIS, and DEAN MEYERS, individually and on
behalf of all others similarly situated

Plaintiffs,

-v-

UNIVERSAL NAVIGATION INC. dba UNISWAP
LABS, UNISWAP FOUNDATION, HAYDEN Z.
ADAMS, PARADIGM OPERATIONS LP, AH
CAPITAL MANAGEMENT, L.L.C. dba
ANDREESSEN HOROWITZ, and UNION SQUARE
VENTURES, LLC,

Defendants.

No. 1:22-cv-2780-KPF

The Honorable Katherine Polk Failla

CLASS ACTION

ORAL ARGUMENT REQUESTED

**NOTICE OF VC DEFENDANTS' MOTION TO DISMISS
THE FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the First Amended Class Action Complaint filed by Plaintiffs Nessa Risley, James Freeland, Robert Scott, Annie Venesky, Andrew Cardis, Dean Meyers, individually and on behalf of all others similarly situated (collectively, the "Plaintiffs") on September 27, 2022 (ECF No. 46); the accompanying Memorandum of Law in support of the VC Defendants' Motion to Dismiss; the Declaration of Susan E. Engel and exhibits thereto; and upon all prior papers and proceedings herein, Defendants Paradigm Operations, LP, AH Capital Management, L.L.C., and Union Square Ventures, LLC (collectively, the "VC Defendants") will move this Court, before the Honorable Katherine Polk Failla, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and at a time to be determined by the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for an order

dismissing with prejudice the First Amended Class Action Complaint and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Scheduling Order entered on November 9, 2022 (ECF No. 61), Plaintiffs' omnibus opposition brief shall be due on February 6, 2023, and Defendants' reply briefs shall be due on February 28, 2023.

Dated: New York, New York
December 21, 2022

LATHAM & WATKINS LLP

By: s/ Susan E. Engel
Susan E. Engel
(susan.engel@lw.com)
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004-1304
Telephone: (212) 637-2200

Benjamin A. Naftalis
(Benjamin.naftalis@lw.com)
Douglas K. Yatter
(douglas.yatter@lw.com)
Julia R. Miller (admitted *pro hac vice*)
(julia.miller@lw.com)
Peter Trombly (admitted *pro hac vice*)
(peter.trombly@lw.com)
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1200

*Attorneys for Defendant AH Capital
Management, L.L.C.*

DEBEVOISE & PLIMPTON LLP

By: s/ Elliot Greenfield
Elliot Greenfield
(egreenfield@debevoise.com)
Maeve L. O'Connor
(moconnor@debevoise.com)
Brandon Fetzer
(bfetzer@debevoise.com)
919 Third Avenue
New York, New York 10022
Telephone: (212) 909-6000

*Attorneys for Defendant Union Square
Ventures, LLC*

Respectfully submitted,

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

By: s/ Alexander C. Drylewski
Alexander C. Drylewski
(alexander.drylewski@skadden.com)
Tansy Woan
(tansy.woan@skadden.com)
One Manhattan West
New York, New York 10001-8603
Telephone: (212) 735-2129

*Attorneys for Defendant Paradigm
Operations LP*